

**IN THE UNITED STATE DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION (PLANO)**

NEAL TECHNOLOGIES, INC.

Plaintiff,

VS.

UNIQUE MOTORSPORTS, INC.

Defendant.

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Civil Action No. 4:15-cv-385

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT

Plaintiff Neal Technologies, Inc. ("NTI") files this Original Complaint against Defendant Unique Motorsports, Inc. ("UMI").

Nature of Action

1. This is an action under the Lanham Act, 15 U.S.C. § 1051, *et seq.*, and Texas law for trademark infringement, unfair competition, and false advertising.

Parties

2. NTI is a corporation organized and existing under the laws of the State of Arizona with its principal place of business in Mesa, Arizona.

3. UMI is a corporation organized and existing under the laws of the State of Texas, with its principal place of business located at 500 East Business 121, Lewisville, Denton County, Texas 75057. UMI may be served with process by serving its registered agent, Dustin Helms, at 500 East Business 121, Lewisville, Denton County, Texas 75057.

Jurisdiction and Venue

4. This Court has jurisdiction over the subject matter of this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331, 1338, and 1367.

5. This Court has personal jurisdiction over UMI because UMI is a Texas corporation, has its principal place of business in Texas, and transacts business in Texas.

6. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c) because UMI resides within the Eastern District of Texas and because, upon information and belief, a substantial part of the events or omissions giving rise to this Complaint occurred within the Eastern District of Texas.

Factual Allegations

NTI and Its Marks

7. NTI is an Arizona-based manufacturer and worldwide seller of aftermarket diesel truck parts and related services, including upgraded oil coolers for Ford Power Stroke® engines known as BulletProof EGR Coolers. Since at least as early as 2008, and long before UMI adopted and began using its infringing designations, NTI has marketed such goods and services under the inherently distinctive BULLET PROOF DIESEL trademark.

8. In addition, since at least as early as June 1, 2009, NTI has continuously used in commerce the BulletProofDiesel.com mark. NTI obtained U.S. Registration No. 4,235,578 on November 6, 2012. A copy of this Registration is attached hereto as **Exhibit A**.

9. Similarly, and again since at least as early as June 1, 2009, NTI has continuously used in commerce the BulletProofDiesel.com and Design mark. NTI obtained U.S. Registration 4,262,825 on December 25, 2012:



A copy of this Registration is attached hereto as **Exhibit B**. NTI has been using the BULLET PROOF DIESEL word mark for at least six years, resulting in NTI's common law priority ownership of that word mark.

10. Collectively, the marks alleged above in Paragraphs 8 and 9 are referred to herein as the "BulletProof Marks."

11. NTI has invested hundreds of thousands of dollars in advertising, marketing, and promoting its goods and services under the BulletProof Marks.

12. These marketing and promotional efforts include operating a website, www.bulletproofdiesel.com, developed and owned by NTI, an active Facebook page, and continuous and extensive nationwide advertisements in most of the leading truck magazines (such as *Diesel Power*, *Off Road*, *Diesel World*, *Four Wheeler*, *8-Lug*, and *Truckin*).

13. To further advertise, market, and promote its BulletProof Marks, NTI has spent considerable sums to sponsor racing teams competing in both the Score International Racing Series, which has events in Mexico and California, and the Lucas Oil Off Road Racing Series, which has events in California, Arizona, Utah, and Nevada. Events from both racing series are broadcast nationally on the CBS Sports Network.

14. NTI has also been the subject of numerous national magazine articles that have prominently featured the BulletProof Marks, including *Off-Road*, *Diesel Power*, *Diesel Tech*, *Diesel World*, *RV*, and *Four Wheeler*.

15. In addition, NTI has built a successful network of over 150 preferred BULLET PROOF DIESEL parts installers across the United States and Canada, further enhancing NTI's brand recognition and consumer loyalty. One such authorized installer is NTX Diesel, located in Lewisville, Texas, less than 5 miles away from UMI's place of business.

UMI

16. Upon information and belief, UMI customizes, repairs, modifies, and sells cars and trucks, including rebuilding and retrofitting engines. UMI markets itself as having a "specialty . . . in 6.0 [Ford] Powerstroke diesel performance."

17. In that regard, UMI has marketed itself on its Google+ page, <https://plus.google.com/100103624505240262292/about>, as being "the leaders in Bulletproof F250s and F350s" and has stated that "We Bullet Proof more than 250 trucks a year, more than any other shop in the country." A screenshot of UMI's Google+ page as of June 5, 2015 is attached hereto as **Exhibit C**.

18. On the homepage of its website, www.unique-motorsports.com/home/, UMI boasts that "Unlike most of our competition who does bulletproof packages, our Earthquake Packages include some very unique and specific differences that the majority of our competition just does not have." Elsewhere on UMI's website, UMI boasts "Unlike the "bulletproof package" you may have heard about before, our packages offer a variety of differences that we believe will make your truck last longer and perform better." Screenshots of UMI's homepage of its website and its "Ford

Powerstroke Diesel Performance” page as of June 5, 2014 are attached hereto as **Exhibits D** and **E** respectively.

19. UMI also advertises certain Ford Power Stroke® diesel performance packages on its website identified as “Earthquake Packages.” For the Stage 3, 4, and 5 “Earthquake Packages” for Powerstroke 6.0L 2003-2007 diesel engines, UMI offers the option of selecting either an “EGR Delete or Bulletproof EGR.”¹

20. Finally, UMI maintains an active Twitter account: <https://twitter.com/umotorsport>. In one tweet, UMI states “Were about to take a customers 6.0 powerstroke to the next level! Stay tuned #builtpowerstroke #bulletproof #fastdiesel.” A screenshot of UMI’s Twitter feed as of June 5, 2015 is attached hereto as **Exhibit F**.

21. Notwithstanding these numerous references to NTI’s BulletProof Marks, upon information and belief, UMI does not sell or install NTI’s BulletProof aftermarket diesel parts.

22. The terms BULLETPROOF, Bulletproof, bulletproof, and Bullet Proof, as used in UMI’s marketing, advertising, and promotional materials, including its website, are referred to herein as the “Infringing Designation.”

23. Although not affiliated with or endorsed by NTI in any manner, UMI continues to use the Infringing Designation without NTI’s authorization or permission and over NTI’s objection.

NTI Notifies and Demands UMI Cease and Desist

24. On or about February 4, 2015, counsel for NTI sent a cease and desist letter to UMI’s owner and registered agent, Dustin Helms, notifying UMI that it was infringing on NTI’s Marks and that such infringing must cease.

¹ See Ex. E at pp. 2-3.

25. On February 9, 2015, Helms responded to the cease and desist letter by email and stated “We will comply with your cease and desist. We will need 2 weeks to change everything over and we will no longer use the BULLETPROOF term to describe our builds. Please let me know if this is acceptable.”

26. On February 26, 2015, “Bulletproof” remained on UMI’s website and counsel for NTI emailed Helms again asking him to remove them. He included a printout of UMI’s website highlighting the remaining uses of Bulletproof. On the same day, Helms emailed counsel for NTI and informed him that he would “forward this to our attorney to get his thoughts . . . and get back to you on this.”

27. On May 1, 2015, after having received nothing further from UMI, counsel for NTI emailed Helms and again asked him to remove all remaining references to BULLETPROOF from UMI’s website.

28. On May 5, 2015, Helms responded that “We have changed our terminology on our packages and we have also re worded all of our advertisement. Please tell me how we are not complying. We are calling our package the Earthquake package now”

29. On May 5, 2015, counsel for NTI referred Helms and NTI to the February 26th attachment and stated that “All of that highlighted language must be removed.” On May 6, Helms replied “Ok please give me a few days to look through this.”

30. On May 18, 2015, nearly two weeks later, counsel for NTI emailed Helms and informed him he had “ample time to investigate and respond to our cease and desist demands. If we do not hear from you by the end of the week, our client intends to file a suit for trademark infringement, false advertising, and unfair competition against you and your business. To avoid

such an outcome, please remove all remaining BULLETPROOF references from your website by Friday.”

31. On May 22, 2015, Helms responded that “My internet is down till probably wednesday but we will attempt to make changes when we’re back online.”

32. A copy of the correspondence referred to in Paragraphs 25 through 31 is attached hereto as **Exhibit G**.

33. As of the date of this filing, UMI has not removed the BULLETPROOF references from its website or other promotional, marketing, and advertising material.

34. NTI has demanded that UMI cease using the Infringing Designation and the BulletProof Mark, but UMI has failed and refused to cease such use.

Count 1

Federal Trademark Infringement In Violation of Lanham Act § 32 (15 U.S.C. § 1114(1))

35. NTI repeats and reasserts all allegations contained in Paragraphs 1 through 34 above as if they were stated in full herein.

36. This is a claim by NTI for infringement of its trademarks.

37. The BulletProof Marks are in full force and effect and have never been abandoned.

38. The BulletProof Marks are inherently distinctive or, alternatively, have acquired distinctiveness through extensive promotion and advertising.

39. The BulletProof Marks are owned by NTI and are widely used by NTI throughout the United States.

40. NTI intends to reserve and maintain its rights with respect to the BulletProof Marks and to continue to use its BulletProof Marks in connection with the sale of aftermarket diesel truck

parts and related goods and services, including goods and services that directly compete with those offered, marketed, and sold by UMI under the Infringing Designation.

41. By virtue of the goodwill and reputation for quality associated with the BulletProof Marks and NTI's extensive efforts at promoting, advertising, and utilizing the BulletProof Marks, the BulletProof Marks have developed a secondary meaning and significance in the minds of those in the market for aftermarket diesel truck parts and related goods and services. The goods and services provided under the BulletProof Marks are immediately identified by the purchasing public with NTI (or as emanating from a single source).

42. UMI's unauthorized use of the BulletProof Marks and Infringing Designation in order to sell its own aftermarket diesel performance packages for Ford Power Stroke® diesel trucks, as alleged herein, reproduces, counterfeits, copies, colorably imitates, and constitutes infringement of NTI's BulletProof Marks and is likely to cause confusion and mistake in the minds of the purchasing public as to the source of the goods and services in violation of 15 U.S.C. § 1141(1).

43. The actions of UMI complained of herein constitute willful and intentional infringement of the BulletProof Marks in total disregard of NTI's proprietary rights. Those actions were commenced and have continued in spite of UMI's knowledge that the use of any of the BulletProof Marks, or any reproduction, counterfeit, copy, or colorable imitation thereof, was and is in direct contravention of NTI's rights.

44. UMI's unauthorized use of the BulletProof Marks is greatly and irreparably damaging to NTI in the form of: (i) loss of income, sales revenue and profits; (ii) interference with NTI's ability to exploit its rights; (iii) confusion in the marketplace as to the duly authorized source of the goods and services provided in connection with the BulletProof Marks; and (iv) impairment

of the goodwill NTI has in its BulletProof Marks. If not enjoined, NTI will suffer irreparable damage to its rights in the BulletProof Marks and its business, reputation, and goodwill.

45. NTI has no adequate remedy at law.

46. NTI is entitled to permanent injunctive relief against UMI under 15 U.S.C. § 1116.

47. NTI is entitled to recover from UMI its profits, all damages that NTI has sustained from UMI's infringement, prejudgment interest, and the costs associated with this action under 15 U.S.C. § 1117.

48. UMI's conduct renders this an exceptional case. Accordingly, NTI is also entitled to recover from UMI treble damages and reasonable attorney's fees under 15 U.S.C. § 1117.

Count 2

Unfair Competition, False Designation of Origin, and False Descriptions In Violation of Lanham Act § 43(a) (15 U.S.C. § 1125(a))

49. NTI repeats and reasserts all allegations contained in Paragraphs 1 through 48 above as if they were stated in full herein.

50. The BulletProof Marks are each individually distinctive, because they have been used throughout the United States and are well known to the trade and to those in the market for aftermarket diesel truck parts and related goods and services.

51. Those in the market for aftermarket diesel truck parts and related goods and services associate and identify the BulletProof Marks with NTI and/or the goods and services NTI provides (or associates them with a single source), including the manufacturing and sale of Bullet Proof EGR coolers designed specifically for Ford Power Stroke® diesel trucks.

52. UMI's conduct in the advertising, sale, and offering for sale of aftermarket diesel truck parts and related goods and services under the Infringing Designation, and UMI's use of the BulletProof Marks, constitutes false designation of origin or sponsorship of UMI's goods and

services and tends falsely to represent that UMI's goods and services originate from NTI (or from the same source that markets and sells goods and services under the BulletProof Marks) or that such goods and services of UMI have been sponsored, approved, or licensed by NTI or are in some way affiliated or connected with NTI, all in violation of 15 U.S.C. § 1125(a).

53. By way of example, UMI lists the "Bulletproof EGR" as an option in its Earthquake Packages 3, 4, and 5 even though, upon information and belief, UMI does not sell or install NTI Bullet Proof EGR coolers.² In addition, UMI claims on its website that "Unlike the 'bulletproof package' you may have heard about before, our packages offer a variety of differences that we believe will make your truck last longer and perform better."³ By this statement, UMI is claiming that its diesel performance package is a "bulletproof package." These are false or misleading statements of fact that deceive or are likely to deceive potential customers in a material way that are likely to influence the consumer's purchasing decision.

54. UMI has also engaged in false comparative advertising by claiming that its Earthquake Packages "will make your truck last longer and perform better" than other "bulletproof packages."⁴ This is a false or misleading statement of fact about UMI's product which has deceived or has the capacity to deceive a substantial segment of potential consumers and is material, in that it is likely to influence the consumer's purchasing decision. UMI is claiming that its diesel performance packages *will* make potential consumers' trucks last longer and perform better than NTI's diesel performance BulletProof packages without any substantiation.

² See Ex. E at pp. 2-3.

³ See *id.* at p. 1.

⁴ See *id.*

55. UMI's actions were done willfully in full knowledge of the falsity of such designations of origin and such descriptions or representations and of the statements of fact and with express intent to cause confusion, mislead, and deceive the purchasing public.

56. UMI's unlawful acts constitute commercial use in interstate commerce.

57. UMI's unauthorized use of the BulletProof Marks is greatly and irreparably damaging to NTI in the form of: (i) loss of income, sales revenue, and profits; (ii) interference with NTI's ability to exploit its rights; (iii) confusion in the marketplace as to the duly authorized source of the goods and services provided in conjunction with the BulletProof Marks; and (iv) impairment of the goodwill NTI has in its BulletProof Marks. If not enjoined, NTI will continue to suffer irreparable injury to its rights in the BulletProof Marks and to its business, reputation and goodwill.

58. NTI has no adequate remedy at law.

59. NTI is entitled to permanent injunctive relief against UMI under 15 U.S.C. § 1116.

60. NTI is entitled to recover from UMI its profits, all damages that NTI has sustained from UMI's infringement, prejudgment interest, and the costs associated with this action under 15 U.S.C. § 1117.

61. UMI's conduct renders this an exceptional case. Accordingly, NTI is also entitled to recover from UMI treble damages and reasonable attorney's fees under 15 U.S.C. § 1117.

Count 3

Trademark Infringement and Unfair Competition Under Texas Common Law

62. NTI repeats and reasserts all allegations contained in Paragraphs 1 through 61 above as if they were stated in full herein.

63. NTI is, and at all times mentioned in this Complaint has been, engaged in the business of manufacturing and selling aftermarket diesel truck parts and related services, including

upgraded oil coolers for Ford Power Stroke® engines known as BulletProof EGR Coolers. NTI owns the registered BulletProof Marks identified herein.

64. UMI, without NTI's consent, is using a reproduction, counterfeit, copy, or colorable imitation of NTI's BulletProof Marks in connection with selling, offering for sale, or advertising of goods and services, namely its own aftermarket diesel performance packages for Ford Power Stroke® diesel trucks.

65. UMI's use of NTI's BulletProof Marks and/or the Infringing Designation is likely to deceive or cause confusion or mistake as to the source or origin of UMI's goods or services. As alleged in more detail above, UMI's acts constitute federal trademark infringement under Section 32 of the Lanham Act. These acts also constitute trademark infringement and unfair competition under Texas common law.

66. Unless UMI is enjoined from the acts complained of, NTI will suffer irreparable harm, for which NTI has no adequate remedy at law. NTI is entitled to an injunction under Rule 683 of the Texas Rules of Civil Procedure.

67. NTI is entitled to recover from UMI its lost profits resulting from UMI's infringement.

Jury Demand

NTI demands a trial by jury on all issues so triable.

Prayer for Relief

WHEREFORE, NTI respectfully requests that the Court:

A. Permanently enjoin UMI from continuing to use the BulletProof Marks (or any derivation of colorable imitation thereof), or any of them, including the Infringing Designation, in conjunction with the sale of aftermarket diesel truck parts and related goods and services;

B. Compel UMI to destroy all marketing and promotional materials displaying, or to remove therefrom all references to, the Infringing Designations or any other term or mark confusingly similar to BulletProof Marks, or any of them;

C. Award NTI compensatory and treble damages associated with UMI's past use and infringement of the BulletProof Marks, including but not limited to three times UMI's profits, and three times the damages sustained by NTI as the result of UMI's conduct;

D. Award NTI its costs incurred herein, prejudgment interest, and attorney's fees; and

E. Award such further and/or alternative relief this Court deems proper.

Respectfully submitted,

/s/ Scott A. Fredricks
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**ATTORNEYS FOR PLAINTIFF
NEAL TECHNOLOGIES, INC.**

EXHIBIT A

United States of America

United States Patent and Trademark Office

BulletProofDiesel.com

Reg. No. 4,235,578

Registered Nov. 6, 2012

Int. Cls.: 7, 9 and 37

TRADEMARK

SERVICE MARK

PRINCIPAL REGISTER

NEAL TECHNOLOGIES, INC. (ARIZONA CORPORATION)
134 EAST BROADWAY, SUITE 102
MESA, AZ 85210

FOR: AUTOMOTIVE COMPONENTS, NAMELY, OIL COOLERS AND EXHAUST GAS RE-CIRCULATION COOLERS FOR DIESEL ENGINES; OIL FILTRATION SYSTEMS COMPRISED OF FILTERS FOR MOTORS AND ENGINES AND LIGHT BARS FOR SPORT UTILITY VEHICLES, IN CLASS 7 (U.S. CLS. 13, 19, 21, 23, 31, 34 AND 35).

FIRST USE 6-1-2009; IN COMMERCE 6-1-2009.

FOR: VEHICLE ENGINE PARTS, NAMELY, ENGINE OIL THERMOSTATS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 6-1-2009; IN COMMERCE 6-1-2009.

FOR: VEHICLE SERVICES, NAMELY, REPAIR AND MAINTENANCE OF DIESEL ENGINES; REPAIR AND RE-MANUFACTURE OF DIESEL ENGINE COMPONENTS, NAMELY, ENGINE OIL COOLERS AND EXHAUST GAS RE-CIRCULATION COOLERS, IN CLASS 37 (U.S. CLS. 100, 103 AND 106).

FIRST USE 6-1-2009; IN COMMERCE 6-1-2009.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

SER. NO. 76-705,715, FILED 12-17-2010.

MARLENE BELL, EXAMINING ATTORNEY



David J. Kybas

Director of the United States Patent and Trademark Office

EXHIBIT B

United States of America

United States Patent and Trademark Office



BULLETPROOFDIESEL
-COM-

Reg. No. 4,262,825

Registered Dec. 25, 2012

Int. Cls.: 7, 9 and 37

TRADEMARK

SERVICE MARK

PRINCIPAL REGISTER

NEAL TECHNOLOGIES, INC. (ARIZONA CORPORATION)
134 EAST BROADWAY, SUITE 102
MESA, AZ 85210

FOR: AUTOMOTIVE COMPONENTS, NAMELY, OIL COOLERS AND EXHAUST GAS RE-CIRCULATION COOLERS FOR DIESEL ENGINES; OIL FILTRATION SYSTEMS COMPRISED OF FILTERS FOR MOTORS AND ENGINES AND LIGHT BARS FOR SPORT UTILITY VEHICLES, IN CLASS 7 (U.S. CLS. 13, 19, 21, 23, 31, 34 AND 35).

FIRST USE 6-1-2009; IN COMMERCE 6-1-2009.

FOR: VEHICLE ENGINE PARTS, NAMELY, ENGINE OIL THERMOSTATS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 6-1-2009; IN COMMERCE 6-1-2009.

FOR: VEHICLE SERVICES, NAMELY, REPAIR AND MAINTENANCE OF DIESEL ENGINES; REPAIR AND RE-MANUFACTURE OF DIESEL ENGINE COMPONENTS, NAMELY, ENGINE OIL COOLERS AND EXHAUST GAS RE-CIRCULATION COOLERS, IN CLASS 37 (U.S. CLS. 100, 103 AND 106).

FIRST USE 6-1-2009; IN COMMERCE 6-1-2009.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE ".COM", APART FROM THE MARK AS SHOWN.

THE MARK CONSISTS OF THE WORDING "BULLETPROOFDIESEL", ".COM" AND DESIGN. THE DESIGN CONSISTS OF TWO CONCENTRIC CIRCLES WITH EIGHT RIVETS ENCIRCLING THE SPACE BETWEEN THE TWO CIRCLES. SUPERIMPOSED ON THE BACKGROUND IS A STYLIZED DEPICTION OF THE STATE OF ARIZONA WITH A RIVET AT EACH ANGLE AND A STYLIZED STAR APPEARS IN THE CENTER. BELOW THE DESIGN IS THE WORDING "BULLETPROOFDIESEL". THE TERM ".COM" APPEARS BELOW THE LETTERS "SEL." IN "DIESEL".



David J. Kappas

Director of the United States Patent and Trademark Office

SER. NO. 76-705,718, FILED 12-17-2010.

MARLENE BELL, EXAMINING ATTORNEY

EXHIBIT C



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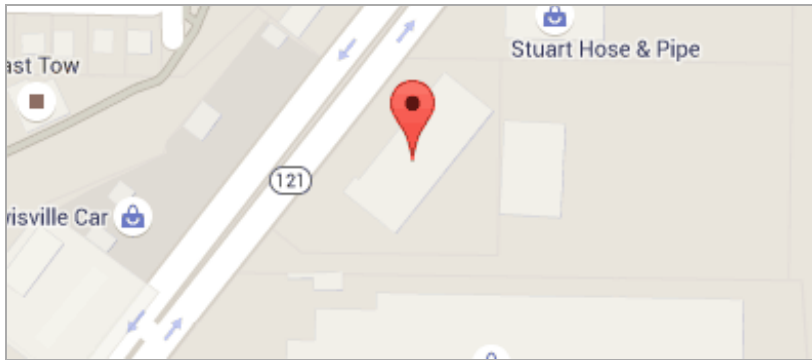
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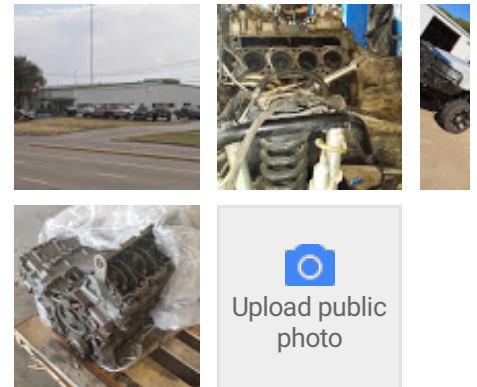
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EXHIBIT D



THE LEADERS IN POWER STROKE DIESEL PERFORMANCE

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Come visit our new 25000sq ft location!
500 E. Business 121 Lewisville, TX 75057

Welcome!

Here at Unique Motorsports, we bring our customers top quality service unrivaled by our competition. Our specialty is in 6.0 Powerstroke diesel performance. We are the founders of our trademark Powerstroke Earthquake Packages. Unlike most of our competition who does bulletproof packages, our Earthquake Packages include some very unique and specific differences that the majority of our competition just does not have. Furthermore, our trucks have been carefully selected so we can pass on the savings to you. We inspect each vehicle and every diesel that we sell has been gone through by our certified technicians. Every fully built 6.0 we sell comes with a warranty and our stamp of approval.

Do some research on the pre-owned vehicle you are looking for, and we are sure you will not find a better deal on a comparable used vehicle. We will offer you a fair price on the vehicle you are trading in, or we will buy your car even if you don't buy one of ours. We also offer Consignment service to sell your car or truck for you, free of charge.

Other Services and Installation

Unique Motorsports offers a wide range of services at great pricing and superior quality on Aftermarket Warranties, Window Tinting, Custom Car Audio & Video installation, Diesel Performance Parts 6.0 Earthquake Packages, EGR Deletes, DPF Deletes, DEF Deletes, Full Exhausts, Programmers, Cold air Intakes, 6.0 Head Gaskets and ARP Head studs, Full Details, Paint and Body Work, Paintless Dent Removal (PDR), and Mechanic Work. We can beat any local price on any vehicle or service.

Contact us today!

Contact Information

Office

469-452-4445

Fax: 469-546-3885

Dustin: 214-402-3044

dustin@unique-motorsports.com

Address:

Unique Motorsports
500 E. Business 121
Lewisville, TX 75057

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EXHIBIT E



THE LEADERS IN POWER STROKE DIESEL PERFORMANCE

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Ford Powerstroke Diesel Performance

The Original Founders of our trademark **EARTHQUAKE Packages** only found at Unique Motorsports!

Dont trust your truck to just anybody! Were not jack of all trades and masters of none like some of our competition who deal with Cummins and Duramax. Powerstrokes are our passion and we know what it takes to make them right.

We are known around the country for our **Powerstroke Earthquake Packages** and average around 250 builds a year, more than just about any other shop in the country!

Why do we call it the **Earthquake Package**? Well, because when you hit the throttle the ground will shake and heads will turn. Unlike the "bulletproof package" you may have heard about before, our packages offer a variety of differences that we believe will make your truck last longer and perform better.

All of our work comes with a warranty and a price guarantee. Call us today and schedule an appointment to get your sick truck healthy again.





Powerstroke 7.3L 1999-2002

Stage 1

*MBRP Turbo-Back Exhaust
S&B Cold Air Intake*

Stage 2

*S&B Cold Air Intake
MBRP Turbo-Back Exhaust
SCT Programmer*

Adds:

*\$100 Chrome tip
TS, Edge CTS, and Bully Dog GT programmers available*

Powerstroke 6.0L 2003-2007

This is what we are known for

Stage 1

*MBRP Cat-Back Exhaust
S&B Cold Air-Intake*

Stage 2

*MBRP Turbo-Back Exhaust
S&B Cold Air-Intake
Blue Spring Upgrade
SCT Programmer*

Stage 3 Earthquake Package By Unique Motorsports

*EGR Delete or Bulletproof EGR
ARP Head Studs
Blue Spring Upgrade
New Head Gaskets
New injector O rings
Replace Dummy Plugs
New Stand Pipes
New 6.4 Banjo Bolts
Coolant Filtration System
New high pressure pump STC fittings
Resurface and rebuild cylinder heads
Rocker Carrier gaskets
Steam intake
Split and clean turbo cases
New Oil cooler*

Stage 4 Earthquake Package By Unique Motorsports

*Turbo-Back Exhaust
S&B Cold Air-Intake
Blue Spring Upgrade
New Lifters
SCT Programmer
EGR Delete or Bulletproof EGR
ARP Head Studs
New Head Gaskets
New injector O rings
Replace Dummy Plugs
New Stand Pipes
New 6.4 Banjo Bolts
Coolant Filtration System
New high pressure pump STC fittings
Resurface and rebuild cylinder heads
Rocker Carrier gaskets
Steam intake
Split and clean turbo cases
New Oil cooler*

Contact Information

Call Us

Office: 469-452-4445
Fax: 469-546-3885

Dustin: 214-402-3044
dustin@unique-motorsports.com

Address:

Unique Motorsports
500 E. Hwy 121
Lewisville, Tx 75057

Stage 5 Earthquake Package By Unique Motorsports

Brand New Crate Engine with 12 month warranty
Turbo-Back Exhaust
S&B Cold Air-Intake
Blue Spring Upgrade
New Lifters
SCT Programmer
EGR Delete or Bulletproof EGR
ARP Head Studs
New Head Gaskets
New injector O rings
Replace Dummy Plugs
New Stand Pipes
New 6.4 Banjo Bolts
Coolant Filtration System
New high pressure pump STC fittings
Resurface and rebuild cylinder heads
Rocker Carrier gaskets
Steam intake
Split and clean turbo cases
New Oil cooler

**You had better hang on tight when you hit that throttle!*

Other Individual Repairs:

We also do injector replacement, FICM Rebuilds, Oil Coolers, HPOP Replacements, EGR delete, and even offer brand new crate engines built to your specifications. You name it, we got you covered!

Adds:

Chrome Tip
Upgrade XRT PRO
EGR Delete
Edge Cts and Bully Dog GT programmers available

Powerstroke 6.4L 2008-2010

Stage 1

Cat-Back Exhaust
S&B Cold Air Intake

Stage 2

MBRP Turbo-Back Exhaust
S&B Cold Air Intake
Programmer

Stage 3 Earthquake Package by Unique Motorsports

Turbo-Back Exhaust
S&B Cold Air Intake
Programmer
EGR Delete
DPF Delete

Stage 4 Earthquake Package by Unique Motorsports

ARP Head Studs
Oil cooler
Turbo-Back Exhaust
S&B Cold Air Intake
Programmer
EGR Delete
DPF Delete

Stage 5 Earthquake Package by Unique Motorsports

Brand New Crate Engine
ARP Head Studs
Oil cooler
Turbo-Back Exhaust
S&B Cold Air Intake
Programmer
EGR Delete
DPF Delete

Adds

Chrome Tip
Upgrade XRT PRO
EGR Delete

Powerstroke 6.7L 2011+

Stage 1

Cat-Back Exhaust
S&B Cold Air Intake

Stage 2

Turbo-Back Exhaust
S&B Cold Air Intake
Programmer

Stage 3 Earthquake Package by Unique Motorsports

Turbo-Back Exhaust
S&B Cold Air Intake
Programmer
DPF Delete
EGR Delete

Adds:

Chrome Tip +\$100
EGR Delete

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EXHIBIT F



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Unique Motorsports specialize in newer GM and Ford trucks and SUV's, with the occasional sports cars and classic cars. We price our inventory very competitively

McKinney, Tx

unique-motorsports.com

Joined January 2012

Tweets **Tweets & replies****Unique Motorsports** @Umotorsport · 21 Dec 2013

A Big Boy Toy at a discount price just in time for Christmas! 2003 Dodge Ram 1500 Lifted 4x4 Hemi on Sale...Hard... fb.me/35efp6x4s

**Unique Motorsports** @Umotorsport · 13 Dec 2013

OK, how much down ?

[#dreamretirementvehicle fb.me/3g3om8UhL](http://fb.me/3g3om8UhL)

**Unique Motorsports** @Umotorsport · 5 Dec 2013

We have decided to sell advertising space on our Excursion Limo. If anyone knows of a business who could benefit...

fb.me/1by1BHVwN

**Unique Motorsports** @Umotorsport · 27 Nov 2013

Happy Thanksgiving from your friends at Unique Motorsports...

[#watchoutfortheturkeysontheroad fb.me/6ABq4cNuN](http://fb.me/6ABq4cNuN)

**Unique Motorsports** @Umotorsport · 12 Nov 2013

Here at Unique Motorsports, we specialize in diesel performance, lift kits and off road accessories, but we can't... fb.me/6sdT7SziQ

**Unique Motorsports** @Umotorsport · 11 Nov 2013

The Holiday Season is upon us, we are getting calls requesting the Limo for Christmas Light tours...call for... fb.me/380D82UwJ

**Unique Motorsports** @Umotorsport · 8 Nov 2013

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**Unique Motorsports** @Umotorsport · 8 Nov 2013



Unique Motorsports @Umotorsport · 8 Nov 2013
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Unique Motorsports @Umotorsport · 7 Nov 2013
A Texas rancher was visiting a farmer in Israel. The proud Israeli showed him around. "Here is where I grow... [fb.me/15VzsolZx](https://www.facebook.com/umotorsport/photos/?fbid=10152811111111111)

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Unique Motorsports @Umotorsport · 2 Nov 2013
First one to \$90K wins!

[#twinturboviper](#), [#undergroundracingviper](#), [#veryfastviper](#)
[fb.me/6xZY8wSMm](https://www.facebook.com/umotorsport/photos/?fbid=10152811111111111)

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Unique Motorsports @Umotorsport · 31 Oct 2013
Were about to take a customers 6.0 powerstroke to the next level! Stay tuned [#builtpowerstroke](#) [#bulletproof](#) [#fastdiesel](#)

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Unique Motorsports @Umotorsport · 27 Oct 2013
What did ya'll think of the Viper?

[#twinturbo](#) [#fastviper](#) [#bestinshow](#) [fb.me/2lv6TGn5A](https://www.facebook.com/umotorsport/photos/?fbid=10152811111111111)

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Unique Motorsports @Umotorsport · 23 Oct 2013
Reminder, Unique Motorsports will be hosting a Trunk or treat Car Show on Saturday October 26th from 9:00 am... [fb.me/2H9IIWYiV](https://www.facebook.com/umotorsport/photos/?fbid=10152811111111111)

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Unique Motorsports @Umotorsport · 21 Oct 2013
Please don't leave your dogs in the car alone, they don't forget...

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Unique Motorsports @Umotorsport · 17 Oct 2013
Unique Motorsports will be hosting a Trunk or Treat Car Show on October the 26th from 9:00 am until Noon. Please... [fb.me/zl8HMwUp](https://www.facebook.com/umotorsport/photos/?fbid=10152811111111111)

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Unique Motorsports @Umotorsport · 15 Oct 2013
Did you know that getting a full detail at Unique Motorsports for your vehicle can help improve your fuel economy?... [fb.me/M0Yp6ci2](https://www.facebook.com/umotorsport/photos/?fbid=10152811111111111)

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Unique Motorsports @Umotorsport · 14 Oct 2013
2006 F250 Fx4 Lariat Super Crew Diesel

Key Features
Power Steering
Anti-Lock Brakes

Runs and drives... fb.me/YVhbORo1



Unique Motorsports @Umotorsport · 11 Oct 2013

1984 Chevy Corvette

The third generation of America's sports car, the Corvette, had an incredibly long run: 1968... fb.me/28bGBOh4N



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[#CamStillCrashingNYC](#)

[Tom Cleverley](#)

[#DoesNOTGoWellWithThe Rich](#)

[Bridge of Spies](#)

EXHIBIT G

Armstrong, James

From: duniquemotorsports.com@gmail.com on behalf of Dustin <dustin@unique-motorsports.com>
Sent: Friday, May 22, 2015 9:55 AM
To: Armstrong, James
Subject: RE: Infringement of BULLET PROOF DIESEL Trademarks

My Internet is down till probably wednesday but we will attempt to make changes when we're back online.

On May 18, 2015 7:16 PM, "Armstrong, James" <James.Armstrong@sackstierney.com> wrote:

Mr. Helms, you have now had ample time to investigate and respond to our cease and desist demands. If we do not hear from you by the end of this week, our client intends to file a suit for trademark infringement, false advertising, and unfair competition against you and your business. To avoid such an outcome, please remove all remaining BULLETPROOF references from your website by Friday.

James W. Armstrong

Attorney
P. [480.425.2628](tel:480.425.2628) | F. [480.425.4928](tel:480.425.4928)

James.Armstrong@SacksTierney.com

SacksTierney P.A.
ATTORNEYS

Sacks Tierney P.A.

4250 N. Drinkwater Blvd., Fourth Floor

Scottsdale, AZ 85251

www.sackstierney.com

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From: duniquemotorsports.com@gmail.com [mailto:duniquemotorsports.com@gmail.com] **On Behalf Of** Dustin
Sent: Wednesday, May 06, 2015 9:27 AM
To: Armstrong, James
Subject: RE: Infringement of BULLET PROOF DIESEL Trademarks

Ok please give me a few days to look through this

On May 5, 2015 5:46 PM, "Armstrong, James" <James.Armstrong@sackstierney.com> wrote:

Please read my February 26 e-mail and review the attached "Home" and "Diesel Performance" pages from your web site, which I have highlighted to show the continuing unlawful references to our client's BULLET PROOF trademark and products. All of that highlighted language must be removed.

James W. Armstrong

Attorney

P. [480.425.2628](tel:480.425.2628) | F. [480.425.4928](tel:480.425.4928)

James.Armstrong@SacksTierney.com

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Scottsdale, AZ 85251

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From: duniquemotorsports.com@gmail.com [mailto:duniquemotorsports.com@gmail.com] **On Behalf Of** Dustin

Sent: Tuesday, May 05, 2015 2:06 PM

To: Armstrong, James

Subject: Re: Infringement of BULLET PROOF DIESEL Trademarks

We have changed our terminology on our packages and we have also re worded all of our advertisements. please tell me how we are not complying. We are calling our package the Earthquake package now...

On Fri, May 1, 2015 at 6:25 PM, Armstrong, James <James.Armstrong@sackstierney.com> wrote:

Mr. Helms, I have received no further communication from either you or your attorney in response to my prior e-mail, nor have you removed any of the remaining false and/or infringing references to BULLETPROOF from your unique-motorsports.com web site. My client remains prepared to commence legal action against you and your business if these violations are not immediately remedied. Please respond by the end of the end of the day, Wednesday, May 6, 2015.

James W. Armstrong

Attorney

P. [480.425.2628](tel:480.425.2628) | F. [480.425.4928](tel:480.425.4928)

James.Armstrong@SacksTierney.com

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www.sackstierney.com

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From: duniquemotorsports.com@gmail.com [mailto:duniquemotorsports.com@gmail.com] **On Behalf Of** Dustin

Sent: Thursday, February 26, 2015 4:05 PM

To: Armstrong, James

Subject: Re: Infringement of BULLET PROOF DIESEL Trademarks

I will forward this to our attorney to get his thoughts. We will get back to you on this.

On Thu, Feb 26, 2015 at 4:16 PM, Armstrong, James <James.Armstrong@sackstierney.com> wrote:

Mr. Helms, more than two weeks have elapsed since your agreement to remove all BULLETPROOF references from the Unique Motorsports web site. As highlighted on the attached pages from that site, however, several such references remain, along with new and unsubstantiated claims that "Unlike the 'bulletproof package' you may have heard about

before, our packages offer a variety of differences that we believe will make your truck ***last longer and perform better.***" Under Section 43(a) of the Federal Lanham Act, such representations may be actionable as false comparative advertising, for which damages and injunctive relief are awardable. See J. THOMAS MCCARTHY, MCCARTHY ON TRADEMARKS AND UNFAIR COMPETITION § 27.59 (4th ed. 2014); see, e.g., *Castrol, Inc. v. Pennzoil Co.*, 987 F.2d 939 (3d Cir. 1993) (defendant found liable for false and improperly tested claim that its motor oil provided "longer engine life and better engine protection" than any leading motor oil). Indeed, the absence of any substantiation for such an advertising claim may cause it to be deemed false *per se*. See *Novartis Consumer Health, Inc. v. Johnson & Johnson-Merck Consumer Pharm. Co.*, 290 F.3d 578, 590 (3d Cir. 2002).

To avoid potential claims for trademark infringement, unfair competition, and false advertising, please remove ***all*** of the remaining references to BULLETPROOF by no later than the close of business on Tuesday, March 3rd.

James W. Armstrong

Attorney

P. [480.425.2628](tel:480.425.2628) | F. [480.425.4928](tel:480.425.4928)

James.Armstrong@SacksTierney.com

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ATTORNEYS

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Scottsdale, AZ 85251

www.sackstierney.com

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From: duniquemotorsports.com@gmail.com [mailto:duniquemotorsports.com@gmail.com] **On Behalf Of** Dustin

Sent: Monday, February 09, 2015 5:33 PM

To: Armstrong, James

Subject: Re: Infringement of BULLET PROOF DIESEL Trademarks

We will comply with your request to cease and desist. We will need 2 weeks to change everything over and we will no longer use the BULLETPROOF term to describe our builds. Please let me know if this is acceptable.

Thank you,

Dustin

214-402-3044

On Wed, Feb 4, 2015 at 4:55 PM, Armstrong, James <James.Armstrong@sackstierney.com> wrote:

Please review the attached letter and respond by February 13, 2015.

James W. Armstrong

Attorney

P. 480.425.2628 | F. 480.425.4928

James.Armstrong@SacksTierney.com

SacksTierney P.A.

A T T O R N E Y S

Sacks Tierney P.A.

4250 N. Drinkwater Blvd., Fourth Floor

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--

Dustin Helms - Owner

Unique Motorsports

www.unique-motorsports.com

469-452-4445 office

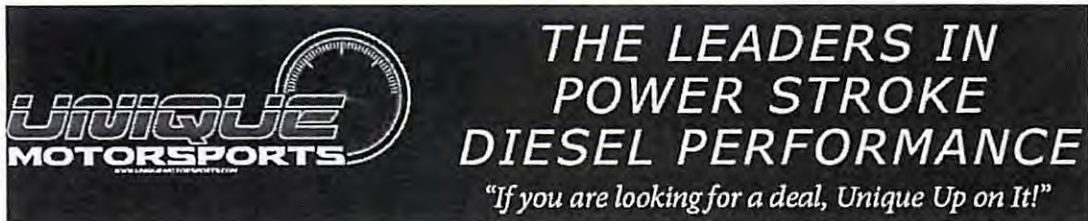
214-402-3044 cell

--

Dustin Helms - Owner
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--

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Welcome!

Here at Unique Motorsports, we bring our customers top quality service unrivaled by our competition. Our specialty is in 6.0 Powerstroke diesel performance. We are the founders of our trademark Powerstroke Earthquake Packages. Unlike most of our competition who does bulletproof packages, our Earthquake Packages include some very unique and specific differences that the majority of our competition just does not have. Furthermore, our trucks have been carefully selected so we can pass on the savings to you. We inspect each vehicle and every diesel that we sell has been gone through by our certified technicians. Every fully built 6.0 we sell comes with a warranty and our stamp of approval.

Do some research on the pre-owned vehicle you are looking for, and we are sure you will not find a better deal on a comparable used vehicle. We will offer you a fair price on the vehicle you are trading in, or we will buy your car even if you don't buy one of ours. We also offer Consignment service to sell your car or truck for you, free of charge.

Other Services and Installation

Unique Motorsports offers a wide range of services at great pricing and superior quality on Aftermarket Warranties, Window Tinting, Custom Car Audio & Video Installation, Diesel Performance Parts 6.0 Earthquake Packages, EGR Deletes, DPF Deletes, DEF Deletes, Full Exhausts, Programmers, Cold air Intakes, 6.0 Head Gaskets and ARP Head studs, Full Details, Paint and Body Work, Paintless Dent Removal (PDR), and Mechanic Work. We can beat any local price on any vehicle or service.

Contact us today!

Contact Information

Office

469-452-4445

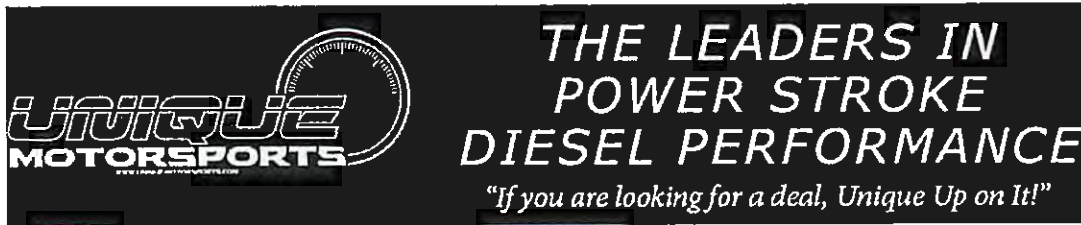
Fax: 469-546-3885

Dustin: 214-402-3044

dustin@unique-motorsports.com

Address:

Unique Motorsports
500 E. Business 121
Lewisville, TX 75057



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Ford Powerstroke Diesel Performance

The Original Founders of our trademark EARTHQUAKE Packages only found at Unique Motorsports!

Dont trust your truck to just anybody! Were not jack of all trades and masters of none like some of our competition who deal with Cummins and Duramax. Powerstrokes are our passion and we know what it takes to make them right. We are known around the country for our Powerstroke Earthquake Packages and average around 250 builds a year, more than just about any other shop in the country!

* Why do we call it the Earthquake Package? Well, because when you hit the throttle the ground will shake and heads will turn. Unlike the "bulletproof package" you may have heard about before, our packages offer a variety of differences that we believe will make your truck last longer and perform better.

All of our work comes with a warranty and a price guarantee. Call us today and schedule an appointment to get your sick truck healthy again.

Powerstroke 7.3L 1999-2002

Stage 1

*MBRP Turbo-Back Exhaust
S&B Cold Air Intake*

Stage 2

*S&B Cold Air Intake
MBRP Turbo-Back Exhaust
SCT Programmer*

Adds:

*\$100 Chrome tip
TS, Edge CTS, and Bully Dog GT programmers available*

Powerstroke 6.0L 2003-2007

This is what we are known for

Stage 1

*MBRP Cat-Back Exhaust
S&B Cold Air-Intake*

Stage 2

*MBRP Turbo-Back Exhaust
S&B Cold Air-Intake
Blue Spring Upgrade
SCT Programmer*

Stage 3 Earthquake Package By Unique Motorsports

*EGR Delete or Bulletproof EGR
ARP Head Studs
Blue Spring Upgrade
New Head Gaskets
New injector O rings
Replace Dummy Plugs
New Stand Pipes
New 6.4 Banjo Bolts
Coolant Filtration System
New high pressure pump STC fittings
Resurface and rebuild cylinder heads
Rocker Carrier gaskets
Steam intake
Split and clean turbo cases
New Oil cooler*

Stage 4 Earthquake Package By Unique Motorsports

*Turbo-Back Exhaust
S&B Cold Air-Intake
Blue Spring Upgrade
New Lifters
SCT Programmer
EGR Delete or Bulletproof EGR
ARP Head Studs
New Head Gaskets
New injector O rings
Replace Dummy Plugs
New Stand Pipes
New 6.4 Banjo Bolts
Coolant Filtration System
New high pressure pump STC fittings
Resurface and rebuild cylinder heads
Rocker Carrier gaskets
Steam intake
Split and clean turbo cases
New Oil cooler*

Stage 5 Earthquake Package By Unique Motorsports

*Brand New Crate Engine with 12 month warranty
Turbo-Back Exhaust
S&B Cold Air-Intake
Blue Spring Upgrade
New Lifters
SCT Programmer
EGR Delete or Bulletproof EGR*

ARP Head Studs
New Head Gaskets
New injector O rings
Replace Dummy Plugs
New Stand Pipes
New 6.4 Banjo Bolts
Coolant Filtration System
New high pressure pump STC fittings
Resurface and rebuild cylinder heads
Rocker Carrier gaskets
Steam Intake
Split and clean turbo cases
New Oil cooler

**You had better hang on tight when you hit that throttle!*

Other Individual Repairs:

We also do injector replacement, FICM Rebuilds, Oil Coolers, HPOP Replacements, EGR delete, and even offer brand new crate engines built to your specifications. You name it, we got you covered!

Adds:

Chrome Tip
Upgrade XRT PRO
EGR Delete
Edge Cts and Bully Dog GT programmers available

Powerstroke 6.4L 2008-2010

Stage 1

Cat-Back Exhaust
SSB Cold Air Intake

Stage 2

MBRP Turbo-Back Exhaust
SSB Cold Air Intake
Programmer

Stage 3 Earthquake Package by Unique Motorsports

Turbo-Back Exhaust
SSB Cold Air Intake
Programmer
EGR Delete
DPF Delete

Stage 4 Earthquake Package by Unique Motorsports

ARP Head Studs
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Stage 5 Earthquake Package by Unique Motorsports

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SSB Cold Air Intake
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EGR Delete
DPF Delete

Adds

Chrome Tip
Upgrade XRT PRO
EGR Delete

Powerstroke 6.7L 2011+

Stage 1

Cat-Back Exhaust

S&B Cold Air Intake

Stage 2

*Turbo-Back Exhaust
S&B Cold Air Intake
Programmer*

Stage 3 Earthquake Package by Unique Motorsports

*Turbo-Back Exhaust
S&B Cold Air Intake
Programmer
DPF Delete
EGR Delete*

Adds:

*Chrome Tip +\$100
EGR Delete*